

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CERTAIN UNDERWRITERS AT LLOYD’S	:	
OF LONDON and HDI GLOBAL	:	
SPECIALTY SE,	:	Civil Action No.: 24-CV-461
	:	
Plaintiffs,	:	(Judge Mehalchick)
	:	
v.	:	
	:	
STRONG TOWER CONSTRUCTION,	:	
LLC, f/k/a KOCH CORPORATION,	:	
	:	
Defendants.	:	

**DISCLOSURE STATEMENT PURSUANT TO RULE 7.1**  
**(Civil Action)**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned, counsel for the plaintiffs, **CERTAIN UNDERWRITERS AT LLOYD’S OF LONDON** and **HDI GLOBAL SPECIALTY SE**, private non-governmental parties, certifies the following:

Plaintiff HDI Global Specialty SE is a non-governmental corporate party. HDI Global Specialty SE is 100% owned by HDI Global SE. HDI Global SE is 100% owned by Talanx AG, a German corporation that is publicly traded. Approximately 77% of Talanx AG’s stock is owned by HDI V.a.G., a mutual insurance company. No other person or entity owns 10% or more of Talanx AG’s stock.

Plaintiff HDI Global Specialty SE is organized and exists pursuant to the laws of Germany, with its principal place of business in Hannover, Germany.

Plaintiff Certain Underwriters at Lloyd’s of London is comprised of Dale Syndicate 1729, Tokio Marine Kiln Syndicate 510, Hiscox Syndicate 33, Axis Syndicate 1686, MS Amlin Syndicate 2001, Acapella Syndicate 2014, and Argo Global Syndicate

1200. After reasonable investigation, to the best of the knowledge of the undersigned, each of these syndicates is comprised of citizens of countries other than the United States and entities that are organized and/or registered pursuant to the laws of the United Kingdom and that have their principal places of business outside of the United States.

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Dated: April 22, 2025